

REMARKS

Claims 11-20 are pending in the application and claims 11-13, 15 and 18-20 stand rejected.

Applicants thank the Examiner for considering the references cited in the Information Disclosure Statement filed December 9, 2005 and acknowledging the claim for foreign priority.

Applicants also thank the Examiner for indicating that claims 14, 16 and 17 would be allowed if rewritten in independent form. Accordingly, Applicants have rewritten claims 14, 16 and 17 into independent form and respectfully submit these claims are in condition for allowance.

Specification Objection

The abstract of the disclosure is objected to for not being in the form of a single paragraph of no more than 15 lines or 150 words.

Applicants submit the amended Abstract submitted herewith obviates this objection.

Claim Rejections - 35 U.S.C. § 102(b)

Claims 11-13, 15, 19 and 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by JP 60266933 (JP '933).

Claim 11 recites, *inter alia*, "wherein the at least one support roller comprises, at least of a periphery thereof, a material which is resiliently deformable so that a module of elasticity of the material is lower than a modulus of elasticity of the metal strip, and which is thermo-capacitive so that the material is able to store, at the core thereof, a part of the thermal energy from the metal strip,

wherein the heat transmitted from the metal strip to the at least one support roller is discharged by a secondary cooling unit which forms,

with a portion of an outer face of the at least one support roller, a zone for transferring heat towards the secondary cooling unit from the supporting roller."

In view of this feature, Applicants respectfully submit that even if the other cooling roll 2 of JP '933 could be construed as being resiliently deformable, JP '933 fails to disclose that the modulus of elasticity of the cooling roll 2 is less than a modulus of elasticity of the steel strip W.

Additionally, JP 933 fails to disclose both that the material constituting each cooling roller 2 is able to store in itself some thermal energy coming from the steel strip W. On the contrary, in JP' 933, the heat transmitted from the still strip W to each cooling roller 2 is discharged by an internal refrigerant flow passage 2.1 of the roller. Further, JP '933 fails to disclose a secondary cooling unit as recited. (Applicants note this position is consistent with the International Search Report of the corresponding PCT application).

Accordingly, Applicants submit JP '933 fails to disclose all the features recited in independent claim 11. Additionally, because claim 15 recites a similar feature, Applicants submit claim 15 is allowable for the same reasons set forth above. Finally, Applicants submit claims 12-13 and 19-20 are allowable, at least by virtue of their dependency, and by virtue of the features recited therein.

Claim Rejections – 35 U.S.C. § 103(a)

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over JP '933 as applied to claim 15 in view of an alleged obvious design modification.

Specifically, the Examiner contends that JP '933 discloses all the features recited in claims except the recitation that the support roller be of any particular size. (*Office Action*, p. 3). In response, Applicants submit that even if the Examiner's purported modification could be

construed as obvious, because such a modification fails to compensate for the above noted deficiencies of JP '933 as applied to claim 15, claim 18 is allowable at least by virtue of its dependency.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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